1		THE HONORABLE BARBARA J. ROTHSTEIN
2		
3		
4		
5		
6	UNITED STATES D	DISTRICT COURT
7	WESTERN DISTRICT AT SEA	T OF WASHINGTON
8)
9	HAROLD LANG,) No. 2:21-cv-00795-BJR
10	Plaintiff,	STIPULATED MOTION AND ORDERAMENDING PRETRIAL SCHEDULING
11	v.	ORDER
12	STATE OF WASHINGTON, et al.,))
13	Defendants.))
14	STIPULATION	
15	The parties, by and through their attorneys of record, hereby stipulate and request that the	
16	Court extend all current pretrial deadlines by 45 days. Extension is necessary for the parties to	
17	seek evidence and schedule depositions that were delayed due to scheduling conflicts among all	
18	parties. Furthermore, due to the appearance of new counsel for the individual DOC defendants,	
19	there is more difficulty in coordinating the schedules of all attorneys thus extended time would	
20 21	allow for a more thorough and organized discovered	overy phase. All parties have good cause for these
	extensions.	
22 23		
24		
- '	STIPULATED MOTION AND [PROPOSED] ORDER	Civil Rights Justice Center PLLC

STIPULATED MOTION AND [PROPOSED] ORDER TO AMEND PRETRIAL SCHEDULING ORDER No. 2:21-cv-00795-BJR Civil Rights Justice Center PLLC 2150 N 107th Street, Suite 520 Seattle, Washington 98133 (206) 557-7719 / Fax: (206) 659-0183

DATED this 3rd day of February, 2022. 1 2 ATTORNEY GENERAL OF WASHINGTON CIVIL RIGHTS JUSTICE CENTER, PLLC 3 /s/ Scott M. Barbara /s/ Darryl Parker Darryl Parker, WSBA #30770 Scott M. Barbara, WSBA #20885 4 Attorney for Plaintiff Attorney for Defendant Kenneth Sawyer 5 WILLIAMS KASTNER 6 /s/ Heidi L. Mandt Heidi L. Mandt, WSBA #26880 7 Attorney for Defendant Marquetta Washington 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24

STIPULATED MOTION AND [PROPOSED] ORDER TO AMEND PRETRIAL SCHEDULING ORDER No. 2:21-cv-00795-BJR

Civil Rights Justice Center PLLC 2150 N 107th Street, Suite 520 Seattle, Washington 98133 (206) 557-7719 / Fax: (206) 659-0183 --

STIPULATED MOTION AND [PROPOSED] ORDER TO AMEND PRETRIAL SCHEDULING ORDER No. 2:21-cv-00795-BJR

ORDER

THIS MATTER having come before the Court on the foregoing Stipulation, and the Court having considered the Stipulation, and good cause appearing, now, therefore:

- 1. Expert Witness Disclosures shall be completed by April 8, 2022.
- 2. Discovery shall be completed by May 6, 2022. Services of responses to interrogatories, requests for production, and requests for admissions, and the takings of depositions, shall be completed by this date. The serving party must serve discovery requests at least thirty days before the deadline in order to allow the other party time to answer.
- 3. Dispositive motions shall be filed and served on or before June 6, 2022. Dispositive motions, responses, and replies, and any supporting documents thereto, will be noted and filed in accordance with Rule 7 of the Federal Rules of Civil Procedure and LCR 7.

DATED this 4th of February 2022.

Barbara Jacobs Rothstein U.S. District Court Judge

Civil Rights Justice Center PLLC 2150 N 107th Street, Suite 520 Seattle, Washington 98133

(206) 557-7719 / Fax: (206) 659-0183

1 **CERTIFICATE OF SERVICE** 2 The undersigned hereby certifies that on February 3, 2022, the foregoing STIPULATED MOTION AND [PROPOSED] ORDER TO AMEND PRETRIAL SCHEDULING ORDER and 3 this CERTIFICATE OF SERVICE was electronically filed with the Clerk of the Court using 4 CM/ECF system which will send notification of such to all counsel of record. 5 6 DATED this 3rd day of February, 2022 at Seattle, Washington. 7 8 /s/Madeleine Wong Madeleine Wong, Legal Assistant 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24